

**EXHIBIT L**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**Drew J. Ribar,**  
Plaintiff,

v.

**State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,**  
Defendants.

**Case No. 3:24-cv-00103-ART-CLB**

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**EXHIBIT L – Social Media Deletion Log and Blocked Accounts List**

**(Bates Nos. EX029–EX030)**

**Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P.  
56)**

Plaintiff Drew J. Ribar, pro se, submits Exhibit L, comprising two Excel spreadsheets obtained via public records request from Carson City: (1) a Social Media Deletion Log of 33 comments on Carson City Sheriff's Office (CCSO) and Public Works Facebook pages from January 22–23, 2024 (Bates EX029), and (2) a Blocked Accounts List from various Carson City social media pages (Bates EX030). Filed manually as Excel files per LR IC 2-2 with a Notice of Manual Filing, this exhibit stands alone as evidence of Defendants' post-dismissal censorship, while cross-referencing Exhibits C, D, E, F, H, I, J, and K to support Plaintiff's claims and Rule 56 motion.

PLEADING TITLE - 1

## Key Evidence and Legal Violations

Section	Incident	Legal Relevance	Cross-Reference
		<b>First Amendment retaliation</b>	
		— <b>censorship of public</b>	
	CCSO deletes 33	<b>criticism</b> ( <i>Knight First</i>	
	comments (1/22–	<i>Amendment Inst. v. Trump</i> , 928	Exhibit C
	1/23/2024): 28 by Plaintiff	F.3d 226 (2d Cir. 2019);	(01:01:40.583,
	alleging Deputy Bueno’s	<i>Davison v. Randall</i> , 912 F.3d	01:05:13.333); Exhibit
<b>Deletion</b>	“illegal arrest” and	666 (4th Cir. 2019);	D (0:20:56); Exhibit E
<b>Log</b>	“hotbox torture” (Exhibit	<i>Packingham v. North Carolina</i> ,	(0:01:04–0:01:20);
<b>(Bates</b>	C video linked), 5 by	582 U.S. 98 (2017)); <i>Monell</i>	Exhibit F (EX001–
<b>EX029)</b>	others (e.g., Eric Brainer:	custom of suppressing dissent	EX002); Exhibit J
	“attempted murder”);	post-arrest (Exhibit F) and	(EX027); Exhibit K
	Plaintiff threatens lawsuit	dismissal (Exhibit K); ties to	(EX028)
	for censorship (1/22/2024,	retaliation for recording ( <i>Nieves</i>	
	15:22:00).	<i>v. Bartlett</i> , 139 S. Ct. 1715	
		(2019)).	
<b>Blocked</b>	CCSO blocks Plaintiff’s	<b>First Amendment violation</b> —	Exhibit E (0:01:04–
<b>Accounts</b>	“Audit Reno” channel;	<b>blocking public forum access</b>	0:01:20); Exhibit J
	others blocked across city	( <i>Packingham, Davison</i> );	(EX027)

Section	Incident	Legal Relevance	Cross-Reference
(Bates EX030)	pages (e.g., Public Works, Health).	retaliation ( <i>Umbehr</i> , 518 U.S. 668 (1996)); <i>Monell</i> policy of city-wide censorship; economic harm to A&A Towing ( <i>Meyer v. Nebraska</i> , 262 U.S. 390 (1923)).	

### Legal Claims Supported

- **First Amendment (42 U.S.C. § 1983):** Censorship and blocking for criticizing CCSO's actions (Exhibits F, J) violate public forum rights (*Knight, Davison, Packingham, Fordyce, Glik, Irizarry, Nieves, Umbehr, Mack*).
- **Fourth Amendment:** Ongoing retaliation post-dismissal (Exhibit K) continues malicious prosecution (*Thompson, Devenpeck, Soldal*).
- **Fifth Amendment:** Late *Miranda* warning (Exhibit D, 0:20:56), part of arrest context fueling protected speech.
- **Eighth Amendment:** *Hotboxing* as cruel and unusual punishment (*Kingsley*, Exhibit J, EX027), censored from comment section.
- **Fourteenth Amendment:** Due process violations in arrest, pretrial flaws (Exhibit H), censorship (*Mathews, Parratt, Meyer, Lewis*).
- **Municipal Liability:** CCSO/DA custom of retaliation via arrest (Exhibit F), indifference (Exhibit J), abandoned prosecution (Exhibit K), and post-dismissal censorship (Exhibit L), ratified across city agencies (*Monell*).

- **State Law Claims:** Oppression under color of law (NRS 197.200); interference with economic advantage (28 U.S.C. § 1367).

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### **Summary Judgment Purpose (Fed. R. Civ. P. 56)**

Exhibit L's censorship evidence (Bates EX029–EX030) proves Defendants' *ongoing retaliation* post-dismissal (Exhibit K), including deletion of Plaintiff's 28 comments and public critiques of the arrest (Exhibit F) and hotboxing (Exhibit J), and blocking Plaintiff's "Audit Reno" channel. Combined with Exhibits C–K, these undisputed facts—*retaliation, pretextual charges, inhumane treatment, and suppression of speech*—violate clearly established law. No reasonable jury could find Defendants' actions justified, entitling Plaintiff to **summary judgment** on the amended complaint.

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### **Qualified Immunity Defeat**

Defendants' actions contravene clearly established rights (*Pearson v. Callahan*, 555 U.S. 223 (2009)):

- **Violations:** Recording retaliation (*Fordyce, Glik, Irizarry, Nieves, Umbehr*), censorship (*Knight, Packingham, Davison, Mack*), malicious prosecution (*Thompson*), due process (*Mathews, Parratt*), inhumane treatment (*Kingsley*), and late *Miranda* (*Miranda v. Arizona*).

- **Clearly Established:** Rights defined pre-2022. Actions show *objective unreasonableness* (*Kingsley*), not mere negligence. “Security risk” or “moderation” defenses fail under *Knight, Nieves, and Harlow* (457 U.S. 800 (1982)).

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### **Authentication**

Per **Fed. R. Evid. 901**, I, Drew J. Ribar, declare under penalty of perjury this Social Media Deletion Log (Bates EX029) and Blocked Accounts List (Bates EX030) were obtained via public records request from Carson City and accurately reflect Defendants’ censorship actions from January 22–23, 2024.

**Dated:** March 27, 2025

/s/ **Drew J. Ribar**

**Drew J. Ribar**

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